REMARKS

Reconsideration of the pending application is respectfully requested in view of the following observations.

1. Rejection of claims 1-3 and 6-8 under 35 USC 102(b) in view of WO 00/69183 (*Vilppula*)

Reconsideration of the rejection is respectfully requested in view of the following observations.

Claim 1 recites a chip card with a plurality of entries referring to a single implementation, where the implementation is associated with a plurality of applications. The applications are related to the entries in that a separate entry is present for each application. The implementation is further executed in different ways depending on the implementation's starting entry.

The *Vilppula* reference teaches a mobile terminal having a SIM card (24) where the SIM card (24) contains a master file (58), a directory (70), a profile selection app (PSA) (60), and separate application profiles (72, 74, 76, 78). The PSA (60) contains the separate application profiles (72, 74, 76, 78) and is used to control access to the applications (see page 11, lines 6-12). Once the user selects a profile, the directory (70) file contains a list of application identifiers (AID) which indicate applications accessible to the user under this profile (see page 12, lines 9-23). The user profile is associated with a particular user through the use of PIN codes to restrict user access to a particular user profile (see page 13, lines 10-21).

The Office Action interprets the user profile of *Vilppula* to be an implementation and the entries as the listing of applications by AID in the directory (70). The applications recited in claim 1 are interpreted literally to be the applications described in *Vilppula*.

It is submitted that the *Vilppula* reference fails to teach or suggest an implementation, entry, and application as required by claim 1.

Firstly, the *Vilppula* reference does not teach an implementation which is executed in different ways depending on the beginning entry. The implementation, in the instant application, is an execution of a particular application. The user profile of

the *Vilppula* reference does not execute any particular application. The user profile is merely an application access control system which restricts the applications that are available to the user and the applications which the user may run.

From our observations of *Vilppula*, the applications themselves are executable programs and thus, stand-alone from the user profile. Specifically, the applications are not dependent on the user profile in order to be executed in the sense that a process is being run on the mobile terminal. The processes of the user profile are also not affected by the different applications since the user profile only grants access to specific applications for execution via an AID. In contrast, the implementation of claim 1 performs the actual execution of an application. The process performed by the implementation then differs depending on the specific application being run.

Secondly, the directory and AIDs of *Vilppula* are not application entries as claimed by claim 1. The AIDs in the directory refer to each executable application in the *Vilppula* reference. The *Vilppula* reference uses an example to illustrate how a user profile functions (see page 12). The directory file of profile 6 contains four AIDs (see page 12, lines 14-15). The four AIDs refer to the WAP, e-money, UMTS1 and PSA executable applications. As a result, three separate applications execute processes when the user selects the WAP, e-money, and UMTS1 applications. In the claimed invention, multiple entries refer to a single executable implementation in the instant application. Thus, the directory and AIDs of *Vilppula* do not teach a plurality of entries referring to the same implementation.

Next, the application of claim 1 is not equivalent to the application disclosed in *Vilppula*. The implementation, in the instant application, performs the actual execution of the processes associated with a particular application. The *Vilppula* reference differs in that each application is shown to be a separate executable program on the SIM card (see Fig. 2, Items 60, 62, 64, 66, 68). The cell phone software program uses the applications to perform different services on the mobile terminal (see page 10, lines 5-11).

The *Vilppula* system, overall, functions completely differently from the system and method of the instant application. The application programs of *Vilppula* are separate and independent of each other, and the AIDs correspond to these separate

application programs. If an application program is made inaccessible in a particular user profile, the AID would not be listed in the directory file and no modification would occur to the underlying file structure. Some portions of the file structure would simply be hidden (see page 12, lines 18-23).

The function of the AIDs in the system of *Vilppula* is distinct from the application entries and the application identifiers of the instant application. The application identifiers are able to compensate for differences between particular applications (see paragraph [0014]). Moreover, the chip card of claim 1 appears to execute a plurality of applications for proving network access authorization, but in reality, a single implementation is performing the execution of the applications in the form of virtual applications (see paragraph 14).

Thus, the *Vilppula* reference fails to teach an implementation associated with a plurality of applications, where separate entries are present for each application and refer to the same implementation.

Accordingly, the *Vilppula* reference fails to teach or suggest every feature of claim 1. Moreover, claims 2, 3, and 6-8 are likewise in condition for allowance in view of their dependency from claim 1 and their individually recited features.

Withdrawal of the rejection of the claims in view of the prior art is kindly requested.

2. Rejection of claims 5 and 9-11 under 35 USC § 103 as being obvious over WO 00/69183 (*Vilppula*)

Reconsideration of this rejection is respectfully requested in view of the discussion above with regard to claim 1 in view of *Vilppula*, and the following observations.

Claims 5 and 9 are dependent from claim 1 discussed above. These claims are patentable in view of their dependency from claim 1 and their individually recited features.

Claim 10 includes similar limitations to claim 1. As discussed above, the *Vilppula* reference fails to teach an entry for each implementation of an application. The *Vilppula* reference is further directed to a method for managing user access to

particular applications and thus, pertains to a different field than the claimed invention of a chip card. A person of ordinary skill would not consider using the teachings of *Vilppula* in the chip card.

From these observations, the *Vippula* reference does not render claims 5 and 9-11 obvious.

3. Conclusion

As a result of the amendment to the claims, and further in view of the foregoing remarks, it is respectfully submitted that the application is in condition for allowance. Accordingly, it is respectfully requested that every pending claim in the present application be allowed and the application be passed to issue.

If any issues remain that may be resolved by a telephone or facsimile communication with the applicant's attorney, the examiner is invited to contact the undersigned at the numbers shown below.

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Respectfully submitted,

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